

James L. Robart
HONORABLE ROBERT S. LASNIK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

0912139 B.C. LTD., a Canadian corporation, and PAKAGE APPAREL INC., a Canadian corporation,

Plaintiffs,

vs.
RAMPION USA INC. a Washington corporation, and RAMPION ENTERPRISES LTD., a Canadian corporation

Defendants.

CIVIL ACTION No. 2:18-cv-1464-RSL

**STIPULATION AND PROPOSED
ORDER TO EXTEND CASE
DEADLINES**

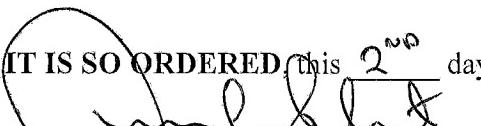
Pursuant to LCR 7(d)(1), Plaintiffs 0912139 B.C. Ltd. and Pakage Apparel Inc. (“Plaintiffs”) and Defendants Rampion USA Inc. (“Rampion USA”) and Rampion Enterprises Ltd. (“Rampion Enterprises”) (collectively, “Defendants”), through their respective undersigned counsel, hereby stipulate to extend the time for Rampion USA to answer or otherwise respond to Plaintiffs’ complaint. The extension would move the deadline for responding to the complaint to November 14, 2018.

Plaintiffs and Defendants stipulate that Rampion Enterprises will accept service of the summons and complaint in this matter and the parties further stipulate that Rampion Enterprises' deadline to answer or otherwise respond to Plaintiffs' complaint is December 21, 2018.

1 Plaintiffs and Plaintiffs' counsel further agree and acknowledge that, other than the defense
2 of insufficient service, this stipulation does not constitute a waiver of any defense of Defendants,
3 including but not limited to the defense of lack of personal jurisdiction or improper venue.

4 The parties respectfully submit that there is good cause for this stipulated motion. The
5 extension of time is reasonable under the circumstances, as the complaint was filed on October 5,
6 2018 and prior to the parties' agreement, as reflected in this stipulation, Plaintiffs had not yet
7 effectuated service on the Canadian defendant, Rampion Enterprises. As no other case deadlines
8 have been set, the extension will not interfere with any other case deadlines, and no other deadlines
9 need to change.

10 Accordingly, the parties respectfully request that the Court extend the deadlines for
11 Defendants to answer or otherwise respond to the complaint, as set forth in this stipulation.

12
13 IT IS SO ORDERED, this 2nd day of November, 2018. 
14
15 HONORABLE ROBERT S. LASNIK James L. Robert 

16 UNITED STATES DISTRICT JUDGE

19 DATED this 30th day of October, 2018

20 DORSEY & WHITNEY LLP

22 s/ Paul Meiklejohn
PAUL MEIKLEJOHN WSBA # 17477
MEIKLEJOHN.PAUL@DORSEY.COM
23 ERIN KOLTER WSBA #53365
KOLTER.ERIN@DORSEY.COM
24 Dorsey & Whitney LLP
Columbia Center

25 STIPULATION AND PROPOSED ORDER TO
EXTEND CASE DEADLINES - 2
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DORSEY & WHITNEY LLP
COLUMBIA CENTER
701 FIFTH AVENUE, SUITE 6100
SEATTLE, WA 98104-7043
PHONE: (206) 903-8800
FAX: (206) 903-8820

701 Fifth Avenue, Suite 6100
Seattle, WA 98104
(206) 903-8800

Attorneys for Defendants

STOEL RIVES LLP

s/ Brian C. Park

BRIAN C. PARK, WSBA No. 25584
600 UNIVERSITY STREET, SUITE 3600
SEATTLE, WA 98101-4109
TELEPHONE: (206) 386-7542
FACSIMILE: (206) 386-7500
EMAIL: BRIAN.PARK@STOEL.COM

Attorneys for Plaintiffs

**STIPULATION AND PROPOSED ORDER TO
EXTEND CASE DEADLINES - 3**
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DORSEY & WHITNEY LLP
COLUMBIA CENTER
701 FIFTH AVENUE, SUITE 6100
SEATTLE, WA 98104-7043
PHONE: (206) 903-8800
FAX: (206) 903-8820